

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

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LAKESHIA AARON

Plaintiff,

v.

TERESA L. FERRELL

Defendant.

2024 MAR -7*P 1:41

TREY GRANGER, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

2:23-cv-374-MHT-CWB

**DEFENDANT'S RESPONSE TO PLAINTIFF'S SECOND AMENDED APPLICATION
TO CLERK FOR ENTRY OF DEFAULT**

COMES NOW, Defendant Teresa Ferrell, by and through undersigned counsel and in response to the Plaintiff's Second Amended Application to Clerk for Entry of Default (Doc. 29) filed in the above-styled cause, states as follows:

Defendant has filed her answer to the complaint. (Answer and Affirmative Defenses, Doc. 30).

Defendant submits that the plaintiff's application for default is due to be denied as moot.

Defendant submits that the failure to file her answer was excusable neglect as an oversight. Indeed, the counsel for the parties conducted a Rule 26(f) Planning Meeting and filed their planning report, (Doc 27), pursuant to which the Court entered a Uniform Scheduling Order, (Doc. 28).

Respectfully submitted,

/s/ Amardo Wesley Pitters
Amardo Wesley Pitters, Esquire
Attorney for the Defendant
Attorney Bar Code: 8998-T64A

SCANNED

03/07/24

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on this the 7th
6th day of March, 2024, a copy of the
foregoing was duly served upon the following:

*Joseph W. Weeks, Esquire
125 Clairemont Avenue, Suite 450
Decatur, Georgia 30030*

by efile.
/electronic mail


/s/ Amardo Wesley Pitters
Amardo Wesley Pitters, Esquire